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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 (HONORABLE ANTHONY J. BATTAGLIA)

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 v.)

14 GREGORIO CRUZ-MERINO (1),)
aka ROBERTO TORRES- HERNANDEZ,)

15)
16 MIGUEL MERINO-CALVERO (2),)

17 Defendants.)
18

CASE NO. No. 08cr1165-JM

DATE: June 6, 2008

TIME: 10:00 a.m.

MOTION TO CONTINUE
VIDEOTAPE DEPOSITION OF
MATERIAL WITNESSES

19 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
20 LUELLA CALDITO, ASSISTANT UNITED STATES ATTORNEY;

21 IT IS HEREBY REQUESTED by the parties in the case, the defendant, Gregorio Cruz-
22 Merino, by and through his counsel, David M.C. Peterson, Esq.; Miguel Merino-Calvero, by and through
23 his counsel, Mahir T. Sherif, Esq.; plaintiff, United States of America, by and through its counsel, Karen
24 P. Hewitt, United States Attorney, and Luella Caldito, Esq., Assistant United States Attorney; and material
25 witnesses Donaciano Ramirez-Merino, Agustin Cavero-Ortiz and Silverino Ramirez-Mejia, by and through
26 their counsel Christopher Y. Lock, Esq., **that the videotaped material witness deposition in the above**
27 **entitled case scheduled for Wednesday, June 4, 2008 at 10:00 a.m., be continued to Friday, June 6,**
28 **2008 at 10:00 a.m.**

1 A proposed order with respect to this joint motion is being submitted directly to the court
2 via efile_battaglia@casd.uscourts.gov.

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5 Respectfully submitted,

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8 Dated: June 2, 2008

/s/ David M.C. Peterson
DAVID M.C. PETERSON
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Cruz-Merino

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11 Dated: June 2, 2008

/s/ Mahir T. Sherif
MAHIR T. SHERIF
Attorney for Mr. Merino-Calvero

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14 Dated: June 2, 2008

/s/ Luella Caldito
LUELLA CALDITO
Assistant United States Attorney

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17 Dated: June 2, 2008

/s/ Christopher Y. Lock
CHRISTOPHER Y. LOCK
Mayfield & Associates
Attorneys for Material Witnesses

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CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing is true and accurate to the best information and belief, and that a copy of the foregoing document has been caused to be delivered this day upon:

Courtesy Copy to Chambers

Copy to Assistant U.S. Attorney via ECF NEF

Copy to Defendant

Dated: June 2, 2008

/s/ DAVID M. PETERSON
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Cruz-Merino
david_peterson@fd.org (email)

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